

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

ROBERTA FOSBINDER-BITTORF

individually and on behalf
of all others similarly situated,

Plaintiff,

Case No: 11-cv-592

vs.

SSM HEALTH CARE OF WISCONSIN, INC.

Defendant.

**JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY PRE-TRIAL AND
TRIAL DEADLINES PENDING SETTLEMENT APPROVAL**

WHEREAS the Plaintiff, individually and on behalf of the members of the putative classes, and Defendant, by and through their undersigned counsel, reached a settlement of the Plaintiff and putative class members' claims through mediation completed on June 6, 2013;

WHEREAS the parties are working jointly to finalize the settlement agreement, and to draft the parties' Joint Motion for Preliminary Approval of Settlement and documents in support thereof;

WHEREAS the parties anticipate filing their Joint Motion for Preliminary Approval of Settlement no later than July 19, 2013; and

WHEREAS pending filing deadlines in this matter will impede the parties' ability to work jointly to prepare and file the documents necessary to effectuate this class action settlement.

WHEREFORE, the parties respectfully request that the Court Stay all pre-trial and trial deadlines in this action pending any decision the Court renders regarding the parties' Joint Motion for Preliminary Approval of Settlement, to be filed no later than July 19, 2013.

Respectfully submitted this 11th day of June, 2013.

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